

### Remarks

Claims 1, 3-7, 9-16, 18 and 20 are pending. Claims 1, 7, 14, 16, and 18 were previously amended. Claims 2, 8, 17, and 19 were previously cancelled. Claims 1, 7, 14, 16, and 18 are currently amended. Claims 1, 3-7, 9-16, 18, and 20 are rejected. Claims 1, 3-7, 9-16, 18, and 20 are rejected under 35 U.S.C. § 102(e) as being unpatentable by U.S. Patent Application No. 6,697,924 to Swank (hereinafter "Swank").

#### **A. Remarks Regarding Rejection of Claims 1, 3-7, 9-16, 18 and 20 under 35 U.S.C. § 102(e)**

Independent claims 1, 7, 14, 16, and 18 have been rejected by the Examiner as being anticipated by Swank. Applicant respectfully submits that in order to establish a *prima facie* case of anticipation, "[t]he identical invention must be shown in as complete detail as is contained in the . . . claim" (*Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)), and that the elements must be arranged as required by the claim. (*In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)). Furthermore, "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631 (Fed. Cir. 1987). With these threshold requirements in mind, Applicant submits a *prima facie* case of anticipation has not been established with respect to Swank.

Claims 1, 7, 14, 16, and 18 have been amended to further clarify that each storage unit that is assigned to a host computer is for use by the applications identified to the storage unit by the associations that contain respective storage unit identifiers for each assigned storage unit. Swank fails to disclose this limitation. Also, Swank does not disclose an application identifier as required by independent claims 1, 7, 14, 16, and 18. Examiner points to Figs. 17 and 18 of

Swank as disclosing application identifiers. Office Action at 4. However, the table of Fig. 17 is a visual representation of LUNs within a given storage device. Swank at 37:17-23. The attributes of the LUN displayed in the sample GUI of Fig. 17 include the host name, the host operating system and the associated IP addresses. Swank at 37:25-31. The attributes of a selected LUN as discussed in Swank are not the same as assigning a storage unit, based at least in part on associations, to a host computer for use only by an application identified by the application identifier of that host computer as required by independent claims 1, 7, 14, 16, and 18.

Further, cited portions of Swank by Examiner discuss the GUI interface that represents operations of storage area networks including assignment and deassignment. Office Action at 4; Swank at 3:50-52. Swank discusses a GUI interface to allow an administrator to assign a logical unit number to a storage area network but not to assign a storage unit to a host based on the associations as provided in the present invention. Swank at 3: 42-44.

For at least these reasons, Swank fails to teach or disclose each and every element of independent claims 1, 7, 14, 16, and 18. As such, Swank fails to anticipate these claims. Applicant respectfully submits that claims 1, 7, 14, 16, and 18 are allowable and requests that the rejection of these claims be withdrawn. As claims 2-6, 8-13, and 15 depend from otherwise allowable base claims rejections to these claims should also be withdrawn.

Examiner states that Claim 20 is rejected as anticipated by Swank without comments. Applicant states that a similar analysis as stated above with respect to the other independent claims applies to Claim 20. Applicant will supplement this response upon further comment by Examiner. As such, Applicant respectfully requests that the rejection to Claim 20 be withdrawn.

**B. Dependent Claims 3-6, 9-13, and 15**

The pending dependent claims will not be addressed individually, as these claims depend from otherwise allowable base claims.

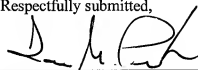
**C. No Waiver**

All of Applicant's arguments and amendments are without prejudice or disclaimer. Additionally, Applicant has merely discussed example distinctions from the cited references. Other distinctions may exist, and Applicant reserves the right to discuss these additional distinctions in a later Response or on Appeal, if appropriate. By not responding to additional statements made by the Examiner, Applicant does not acquiesce to the Examiner's additional statements, such as, for example, any statements relating to what would be obvious to a person of ordinary skill in the art. The example distinctions discussed by Applicant are sufficient to overcome the anticipation rejections.

**Conclusion**

Applicant respectfully submits that pending claims 1, 3-7, 9-16, 18, and 20 are allowable and should be passed to issuance.

Respectfully submitted,



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Tammy M. Pennington  
Registration No. 61,223

Baker Botts L.L.P.  
910 Louisiana  
One Shell Plaza  
Houston, Texas 77002-4995  
(713) 229-1972

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